Stakeholder Engagement Plan (SEP)

500 MWh/ 250 MW HORUS Battery Energy Storage Systems (BESS) Project in Egypt

REV-1

April 2026

Issue and Revision Record:

Template Code		**QF-PM-01-15**	**Template Revision No.**	**REV-0**
Version	**Date**	**Description**	**Prepared By**	**Approved by**
REV 0	28 Oct 2025	Draft SEP Report	ECO Consult	Ibrahim Masri / Project Manager
REV 1	05 March 2026	Draft SEP Report	ECO Consult	Ibrahim Masri / Project Manager
REV 2	29 April 2026	Draft SEP Report	ECO Consult	Ibrahim Masri / Project Manager

Disclaimer:

This report should not be relied upon or used for any other project without an independent check being carried out as to its suitability and prior written authority of AMEA Power being obtained. ECO Consult accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned.

This report is confidential to AMEA Power, and the Consultant accepts no responsibility of whatsoever nature to third parties whom this Report, or any part thereof, is made known. Any such party relies upon this report at their own risk.

TABLE OF CONTENTS

Table of Contents **2**
List of Figures **3**
List of Tables **3**
1. Introduction **1**
1.1 Background 1
1.2 Stakeholder Engagement Plan (SEP) 2
2. Project Description **4**
2.1 Administrative Setup and Project Location 4
2.2 Local Communities 5
2.3 Project Components 6
2.4 Overview of Project Activities 9
2.5 Project Schedule 11
2.6 Workforce Requirements 11
2.7 Other Developments in the Area ..... **Error! Bookmark not defined.**
3. Regulatory Context **12**
3.1 Egyptian Stakeholder Engagement Requirement and Legislation 12
3.2 Lender E&S Requirements 12
4. Identification of Stakeholders **14**
5. Summary of Past Stakeholder Engagement Activities **20**
5.1 Targeted Consultations 21
5.2 Focus Group Discussions 25
6. Future Stakeholder Engagement Strategy, Plan and Responsibilities **28**
7. Stakeholder Grievance Mechanism **32**
8. Contact Details **38**
9. Monitoring and Reporting **39**
9.1 Monitoring Requirements 39
9.2 Reporting Requirements 39
10. Roles and Responsibilities **41**
11. Annexes **42**
11.1 Annex 1 – Grievance Form 42
11.2 Annex 2 – Grievance Log Sheet 43
11.3 Annex 3 – Grievance Resolution Form 44
11.4 Annex 4 – Project Stakeholder Register Form 45

LIST OF FIGURES

Figure 1: Administrative Division of Egypt 5
Figure 2: Suez Governorate ..... **Error! Bookmark not defined.**
Figure 3: Administrative Hierarchy of the Suez Governorate ..... **Error! Bookmark not defined.**
Figure 4: Project Site in Relation to Hurghada ..... **Error! Bookmark not defined.**
Figure 5: Project Site in Relation to Zaafarana Village and Tourist Resorts – Ain Sokhna 6
Figure 6: BESS key components 7
Figure 7: Horus BESS Project Layout ..... **Error! Bookmark not defined.**
Figure 8: Loading and Transportation of BESS Components 10
Figure 9: Project Site location within Zaafarana Wind Farm ..... **Error! Bookmark not defined.**
Figure 10: Project Site in Relation to Wind Farm Developments in the GoS . **Error! Bookmark not defined.**
Figure 11: Project Area in Relation to Nearby Resorts and Military Base 18
Figure 12: FGD Residents and Local Authorities 26
Figure 13 : Grievance Mechanism Process Diagram 32

LIST OF TABLES

Table 1: Region Division of Egypt 4
Table 2: Identified Groups of Stakeholders 14
Table 3: List of Vulnerable Groups and Their Relevance 19
Table 4: Identified Groups of Stakeholders 21
Table 5: Key Outcomes of FGD with Zaafarana Village Residents & Local Authorities 25
Table 6: Key Outcomes of FGD with Regina Beach Resort 27
Table 7: Future Stakeholder Engagement Activities 29

ABREVIATION AND ACRONYMS

Acronym	Definition
AC	Alternating Current
AMR	Annual E&S Monitoring Report
BESS	Battery Energy Storage System
BMS	Battery Management System
BOO	Build Own Operate
CLO	Community Liaison Officer
COD	Commercial Operation Date
CPA	Capacity Purchase Agreement
DC	Direct Current
DWSC	Drinking Water and Sanitation Company
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EEAA	Egyptian Environmental Affairs Agency
EEHC	Egyptian Electricity Holding Company
EETC	Egyptian Electricity Transmission Company
EIB	European Investment Bank
EMF	Electromagnetic Field
EMS	Energy Management System
EPC	Engineering Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESR	Environmental and Social Requirement
FACP	Fire Alarm Control Panel
FGD	Focus Group Discussion
GBV	Gender Based Violence
GDP	Gross Domestic Product
GoE	Government of Egypt
GoS	Gulf of Suez
HSE	Health, Safety and Environment
HV	High Voltage
IBAs	Important Bird Areas
IFC	International Finance Corporation
IFIs	International Financial Institutions
ISES	Integrated Sustainable Energy Strategy
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
KPI	Key Performance Indicator
LILO	Line In Line Out
LV	Low Voltage
MSDS	Material Safety Data Sheet
MV	Medium Voltage

MW	Megawatt
MWh	Megawatt hour
NCE	Nature Conservation Egypt
NFPA	National Fire Protection Association
NGO	Non-Governmental Organization
NREA	New and Renewable Energy Authority
NTS	Non-Technical Summary
OEM	Original Equipment Manufacturer
OHTL	Overhead Transmission Line
OPC	Open Platform Communications
PCS	Power Conversion System
PPA	Power Purchase Agreement
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SOC	State of Charge
SOH	State of Health
SPV	Special Purpose Vehicle
TBD	To Be Determined
TBT	Toolbox Talk
TLBs	Tractor Loader Backhoes
TSS	Total Suspended Solids
VAWG	Violence Against Women and Girls
WMRA	Waste Management Regulatory Authority
WWTPs	Wastewater Treatement Plants

1. INTRODUCTION

1.1 Background

The energy sector is a key driver for the socio-economic development of Egypt, representing around 13% of current Gross Domestic Product (GDP) and thus making economic growth in the country contingent upon the security and stability of energy supply.

Since 2007, Egypt has experienced an energy supply deficit due to the rapid increase in energy consumption and the depletion of domestic oil and gas resources, shifting its position as a net hydrocarbon exporter for the last three decades to that of a net importer.

This has brought a set of challenges to the energy sector, including electricity shortages, caused in part by the decline of domestic gas production, as natural gas is the main source of electricity, accompanied by highly subsidized energy prices, with negative financial implications for already dwindling government revenues.[1]

In response, the Government of Egypt (GoE) has taken bold steps to adopt an energy diversification strategy with increased development of renewable energy and implementation of energy efficiency, including assertive rehabilitation and maintenance programs in the power sector.[2]

To this extent, in 2013, the Arab Republic of Egypt (through the Ministry of Electricity and Renewable Energy) had developed and adopted the Integrated Sustainable Energy Strategy (ISES) 2015 – 2035, which provides an ambitious plan to increase the contribution of renewable energy to 42% of the electricity generated by the year 2035.[3]

In that respect, the GoE issued the Renewable Energy Law (Decree Law 203/2014) to support the creation of a favorable economic environment for a significant increase in renewable energy investment in the country. The law sets the legal basis for the Build, Own and Operate (BOO) scheme to be implemented. Through the BOO mechanism, the Egyptian Electricity Transmission Company (EETC) invites private investors to submit their offers for solar and wind development projects, for specific capacities. In addition, the GoE (through the New and Renewable Energy Authority (NREA)) provides the land for the investors.

These national efforts to expand renewable energy make the role of Battery Energy Storage Systems (BESS) increasingly important. The primary purposes of the BESS are energy shifting and grid support, both of which play a critical role in facilitating the integration of renewable energy into Egypt's power grid by shifting the energy load to peak demand periods; particularly important as the country continues to expand its renewable energy capacity.

In accordance with the above, AMEA Power has been selected to develop a 500 Megawatt hour (MWh) BESS along with a 535 m Overhead Transmission Line (OHTL) (hereafter referred to as the 'Project') located within Zaafarana Wind Farm, in the Gulf of Suez (GoS) region. The Project is to be developed under the Build-Own-Operate (BOO) mechanism, under which a Capacity Purchase Agreement (CPA) has been established. AMEA Power established a Special Purpose Vehicle (SPV) known as Horus that is wholly owned by AMEA Power and that will be responsible for development of this project (hereafter referred to as the 'Developer').

[1] UNIDO – Low-Carbon Hydrogen Assessments in Egypt Highlights (PDF)
[2] Renewable Energy Outlook, Egypt (IRENA, 2018)
[3] Egypt - Countries & Regions - IEA

The Project is expected to perform up to two full cycles per day (each of 2 hours), implying a daily energy throughput of 500 MWh. The Project will help stabilize the grid by balancing supply and demand, reducing blackouts, and enabling smoother integration of variable renewable sources. This initiative aligns with the government's strategy to diversify the energy mix, reduce fossil fuel dependence, and meet its greenhouse gas reduction targets under the Paris Agreement, supporting a more sustainable and resilient energy infrastructure.

This Stakeholder Engagement Plan (SEP) has been developed as an integral component of the Environmental and Social Impact Assessment (ESIA) for the 500 MWh Horus BESS Project. Stakeholder engagement forms a core element of the ESIA process and has been systematically undertaken to inform baseline data collection, impact identification, assessment of Environmental and Social (E&S) risks, and the development of mitigation and management measures.

The outcomes of stakeholder consultations conducted during ESIA preparation have been incorporated into the impact assessment and reflected in the Environmental and Social Management Plan (ESMP) within the ESIA. This SEP formalizes and documents the stakeholder engagement activities undertaken to date as part of the ESIA and establishes the structured framework for continued information disclosure, consultation, and grievance management throughout the construction, operation, and decommissioning phases of the Project.

The SEP has been prepared in alignment with applicable national regulatory requirements governing ESIA disclosure and consultation, as well as relevant international lender standards to include the European Bank for Reconstruction and Development's (EBRD) Environmental and Social Requirements (ESR), ensuring that stakeholder engagement remains proportionate to the Project's E&S risk profile and consistent with Good International Industry Practice (GIIP).

1.2 Stakeholder Engagement Plan (SEP)

This document constitutes a Stakeholder Engagement Plan (SEP) to be implemented by the Developer throughout the construction and operation phase for the Project. The SEP outlines a systematic method to stakeholder engagement that will assist the Developer in developing and maintaining a positive relationship with their stakeholders, particularly the locally affected communities, over time. The SEP is a dynamic document which will be modified through Project construction, operation and implementation.

The Project welcomes suggestions for improvement of this SEP. Suggestions can be submitted via the contact information for the Developer at the end of this document (Section 88).

In particular, this SEP includes the following:

- Section 1 – Introduction: provides a background and introduction on the Project and SEP;
- Section 2 – Project Description: provides a summary of the Project location, main Project components, Project schedule and job opportunities for the construction and operation phase;
- Section 3 – Regulatory Context: highlights the main requirements that are relevant for stakeholder engagement to the Project to include Egyptian regulations and international best practice requirements;
- Section 4 – Identification of Stakeholders: identifies all relevant stakeholders for the construction and operation phase of the Project at all geographic levels to include national, regional and local levels as well as communities within the area of influence of the Project;

- Section 5 – Summary of Past Stakeholder Engagement Activities: provides a summary of past stakeholder engagement activities undertaken for the Project during the planning and design phase of the Project;
- Section 6 – Stakeholder Engagement Strategy and Plan: identifies an engagement strategy for each stakeholder group to include objective for engagement, communication methods and tools, timeframe, and responsibilities;
- Section 7 – Stakeholder Grievance Mechanism: identifies a mechanism for managing and handling any concerns or complaints related to the Project from stakeholders during the construction and operation phase;
- Section 8 – Contact Details: provides contact details of the Developer for communication with all relevant stakeholders of the Project;
- Section 9 – Monitoring and Reporting: identifies the key monitoring and reporting requirements that are applicable for the implementation of the plan; and
- Section 10 – Roles and Responsibilities: identifies the roles and responsibilities for the Developer and other involved entities in implementation of the plan.

2. PROJECT DESCRIPTION

This section provides a detailed description of the Project in relation to its location, the key Project components, and an overview of the proposed activities that are to take place during the construction, operation, and decommissioning phase.

2.1 Administrative Setup and Project Location

Administratively, Egypt is divided into 27 Governorates as presented in Table 1 and Figure 1 below. Governorates are then divided into Aqsam (singular: Qism[4]) or Marakez[5] (Districts) which are then subdivided into local units, which are finally divided into cities, villages and hamlets.

The Project site is located in Suez Governorate, around 160 km southeast of the capital city of Cairo. Suez is one of Egypt's four (4) urban governorates (along with Cairo, Alexandria, and Port Said). Unlike Upper Egypt[6] and Delta governorates, urban governorates are not divided into Marakez (rural districts), as they lack extensive agricultural hinterlands. Instead, Suez is divided into five (5) Aqsam (or Urban Districts), Suez, Arbaeen, Ataqa, Ganayen, and Faisal, each of which comprises neighborhoods and communities under its administration.

The Project site is entirely located within the Ataqa Qism which is the largest district in the Suez Governorate. Ataqa Qism is further divided into four (4) Shiyakhat[7] that are El Semad, El Adabya, El Kabenon, Ain Sokhna. The Project site is located in Ain Sokhna Shiyakha. The Ain Sokhna Town is located around 60 km to the north of the Project site.

It is important to note that the Project site is also located to the east border of an existing wind farm called the Zaafarana Wind Farm.

Although the Project site falls within the administrative boundaries of Suez Governorate, the nearest community settlement is Zaafarana Village, located in the Red Sea Governorate around 5.5 km southeast of the Project site. In contrast, the nearest settlement within Suez Governorate is Suez City, situated about 80 km to the north of the Project site.

Table 1: Region Division of Egypt (corresponding to Figure 1 below)

Governorate	Legend	Governorate	Legend	Governorate	Legend
Cairo	11	Gharbia	3	Suhag	24
Alexandria	7	Menoufia	2	Qena	25
Port-Said	14	Behera	10	Aswan	27
Suez	**12**	Ismaiilia	6	Luxor	26
Damietta	13	Giza	19	Red Sea	22
Dakahlia	4	Bani-Suef	8	El Wadi El Gidid	21

[4] Qism. In the administrative division of Egypt, the Qism is an urban district made up of neighborhoods and residential blocks (not villages). It usually has more commercial and government services than smaller neighborhoods and functions as the main local administrative unit in urban governorates and large cities.

[5] Markaz. In the administrative division of Egypt, the Markaz is the main city or village followed by a group of villages in agricultural areas (not urban), and often the most important city is a Markaz for a total of villages. The Markaz has more commercial markets than villages, and there may also be branches of government service institutions and agencies serving villages. Each Governorate of the Delta and Upper Egypt includes a number of Markaz, Cities and villages.

[6] In Egypt, the terms Upper Egypt and Lower Egypt are based on the flow of the Nile, not geographic north or south. Upper Egypt refers to the upstream stretch of the Nile Valley in the south (including governorates such as Aswan, Luxor, and Qena), while Lower Egypt refers to the downstream Nile Delta in the north.

[7] Shiyakha (plural: Shiyakhat): The smallest administrative unit in Egypt's urban areas, equivalent to a neighborhood or quarter within a city district (Qism). Shiyakhat are primarily used for administrative, census, and service delivery purposes. In rural areas, the equivalent unit is the village or hamlet.

Governorate	Legend	Governorate	Legend	Governorate	Legend
Sharkia	5	Fayoum	18	Matrouh	20
Kalyoubia	1	Menia	17	North Sinai	15
Kafr-El-Sheikh	9	Asyout	23	South Sinai	16

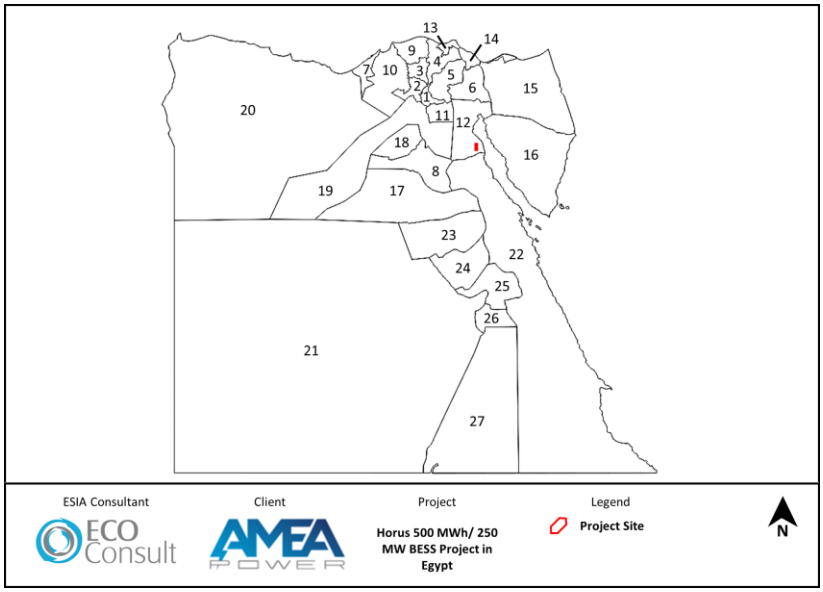

Figure 1: Administrative Division of Egypt

2.2 Local Communities

Throughout the SEP report, the term local communities will be used. This will refer to Zaafarana Village that is located around 5.5 km southeast of the Project site a shown Figure 2 below. In addition, Tourist Resorts – Ain Sokhna are located around 1 km to the north of the Project site a shown Figure 2 below. Therefore, the Tourist Resorts will be considered as a sensitive receptor, even though they are not classified as a community.

Zaafarana Village has been selected as affected communities based on the following rationale:

- Proximity to Site: the closest settlement was considered as local community. Although at an around 5.5 km distance from the Project site, however, this is the community that is most likely to be impacted (positivity or negatively) in some way by the Project.

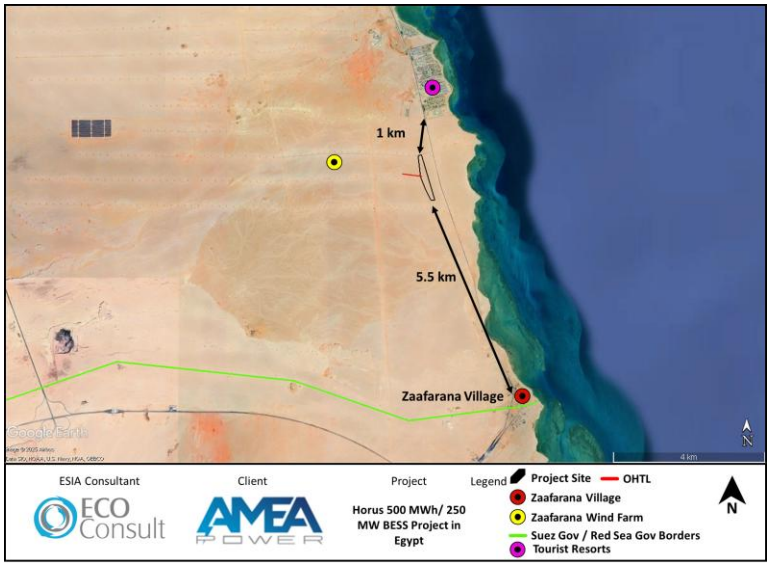

Figure 2: Project Site in Relation to Zaafarana Village and Tourist Resorts – Ain Sokhna

2.3 Project Components

2.3.1 Outline of BESS Technology

The Project aims to connect a BESS with a production capacity of 250 MW to the national grid to enhance grid stability and support the integration of renewable energy sources. The BESS operates by absorbing excess electricity from the grid during periods of low demand and high generation—from renewable energy—and discharging the stored energy back into the grid when demand exceeds supply.

The system is designed to discharge at maximum power for up to two hours, followed by reduced power output for an additional six hours, offering a total discharge window of up to eight hours depending on grid needs.

To enable this functionality, the stored electrical energy passes through several conversion stages. Initially, energy is stored in the battery modules in Direct Current (DC) form. A Power Conversion System (PCS) then converts the DC into Alternating Current (AC) at medium voltage. This AC power is subsequently stepped up to high voltage through power transformers to meet the interconnection requirements of the national grid. The conditioned power is then delivered to the grid via dedicated interconnection facilities.

This process enables the BESS to play a critical role in balancing supply and demand, enhancing system flexibility, and improving the reliability of renewable energy integration.

The figure below presents the key components of a BESS, each of which is discussed in further detail throughout the subsequent sections.

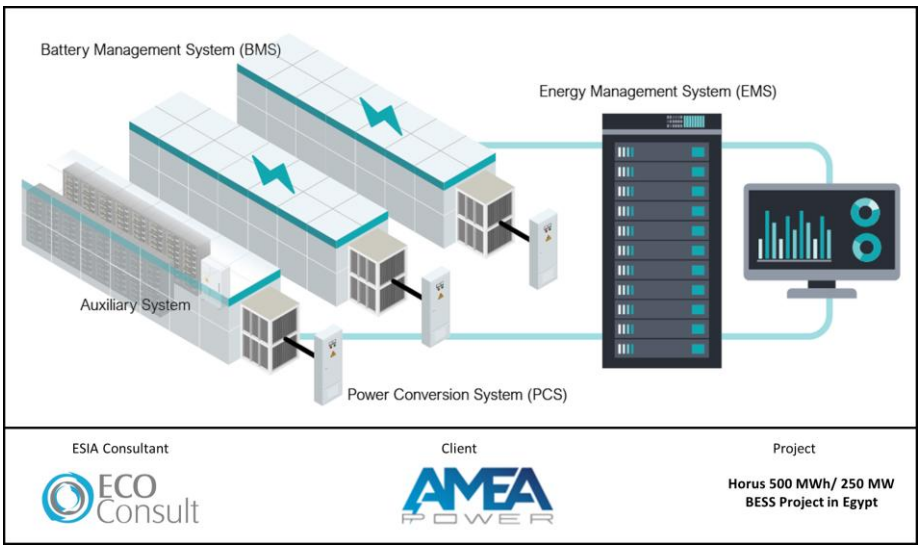

Figure 3: BESS key components

2.3.2 Infrastructure and Utilities

The following highlights the key infrastructure and utility elements that will be required for the Project.

- Substation (including associated civils works and buildings): A substation will be built within the Project site to manage the output from the BESS facility. It will include the necessary equipment to prepare the electricity for export to the grid.
- Grid Connection: The Egyptian Electricity Transmission Company (EETC) will be responsible for offsite connection works from the onsite substation to the National Grid. This is likely to be through an Overhead Transmission Line (OHTL). EETC will be responsible for preparing the detailed design (including identification of the OHTL route), construction activities as well as operation and maintenance activities. It is important to note that at this stage there are no details available by EETC on the OHTL specifications – other than the OHTL route as shown in the figure below (information such as height, number of electrical towers, etc.). However, the OHTL will be connected to an existing 220 kilovolt (kV) OHTL (which is also located within the existing Zaafarana Wind Farm site) around 535 m to the west of the Project site through a Line-in Line-out (LILO) configuration.
- Amenities Building: Utility infrastructure will be provided to meet project needs and comply with applicable standards. The building will include offices and up to three toilets and one shower.
- Access route and internal road: The Project will be accessed via an existing route that connects the Hurghada – Cairo Highway (yellow line in Figure 4 below) to the access road leading to the Project site. Project-related transportation will utilize the Hurghada – Cairo Highway (yellow line) until reaching the Project site, after which vehicles will use the existing internal road network within the existing Wind Farms nearby (blue line in Figure 4 below) to access the Project site. Within the Project boundary, a network of internal roads will be constructed to facilitate access within the Project site (purple lines in Figure 4 below) during construction and operation. The access route and internal road layout are illustrated in **Error! Reference source not found.** and Figure 4 below. The Project will utilize existing roads to the extent possible and will coordinate with the relevant authorities regarding road use as described in the Project's ESIA. Any damage to existing roads resulting directly from Project-related traffic will be addressed and repaired, where required, in coordination with the responsible entities.

- Drainage and Stormwater Management: Appropriate drainage infrastructure will be incorporated to manage surface runoff within the Project site.
- Telecommunications: Communication systems will be installed for operational control, data transfer, and emergency response, in line with utility and regulatory requirements.
- Water supply: Water will be supplied from through Water trucks to the site. The water will subsequently be stored on-site in storage tanks for construction activities use.
- Security Measures: Security measures will be implemented at the Project site, including perimeter fencing, controlled access points, security personnel, and surveillance systems (e.g., CCTV) to ensure the safety and security of the facility.

X

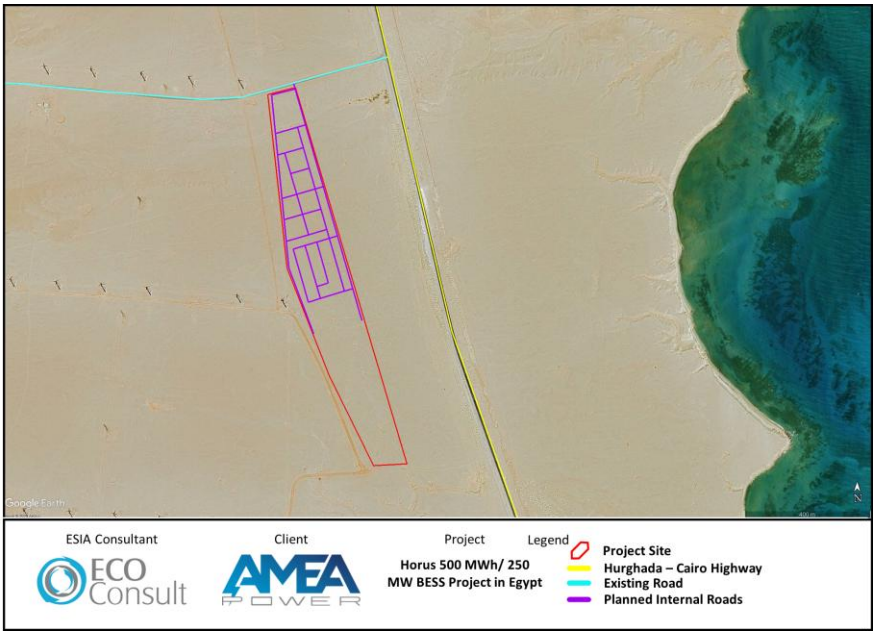

Figure 4: Project Planned Internal Roads and Existing Roads

2.3.3 Other Temporary Components

There are additional Project components that will be required on a temporary basis throughout the construction phase of the Project in particular. Those are identified below. The location of such components will be within the Project footprint.

- Site Offices: temporary offices that will be used by Developer and Engineering, Procurement and Construction (EPC) Contractor staff during the construction phase.
- Welfare Facilities: temporary welfare facilities will be established during the construction phase to support the health, safety and hygiene requirements of construction personnel. These might include sanitary facilities (toilets and handwashing stations), potable drinking water supply, shaded rest areas, designated eating areas, and first aid provisions. Welfare facilities may be located within the temporary site office compound. It is expected that these facilities will be within the Project footprint.

- Laydown areas: this is a temporary storage area where tools, materials, equipment and vehicles are stored when not in use.
- Generators: generators will be used for supply of electricity throughout the construction phase of the Project for various power supply requirements. There will be no temporary power supply lines erected before or during the construction period.
- Transport Vehicles and Machinery: During the construction phase, a fleet of machinery—including excavators, Tractor-Loader-Backhoes (TLBs), concrete mixers, concrete pumps, cranes, compaction rollers, and water trucks—will be mobilized.

2.4 Overview of Project Activities

This section presents the likely activities to take place during the Project development, and which will include four distinct phases: (i) planning and design, (ii) construction, (iii) operation, and (iv) decommissioning. Each of which is summarized below.

2.4.1 Planning and Design Phase

This phase will involve the following:

- Completion of all required studies for Project development. This will include but not limited to ESIA, topography study, geotechnical study, etc.;
- Obtaining and finalizing required financing from International Financial Institutions (IFIs);
- Obtaining required permits;
- Appointment of EPC Contractor; and
- Preparation of detailed design and layout requirements.

2.4.2 Construction Phase

The typical activities that will take place during the planning and construction phase include the following:

- Mobilization of Project team and equipment to the site and recruitment of workers;
- Undertaking mobilization works for temporary facilities which will involve deployment of site offices and laydown areas;
- Shipment of the BESS components (i.e. containers) by road from the nearest port to the Project site. This will be through hauling trucks. Each container (i.e. each PCS and BESS) will require one (1) truck and one (1) trip to transport with no abnormal loads as shown in Figure 5 below. It will be a heavy load, however, not an abnormal load, but inside a standard 20-foot shipping container for the BESS and 40-foot shipping container for the PCS. No more than 150 truck trips containers in total are expected to be required.

- Site preparation for the installation of battery container foundations, involving survey works, site clearing, grading, levelling, excavation, and cement works;
- Excavation and backfilling activities for foundations and cable trenches;
- Installation of BESS components, including battery containers, associated electrical and power conversion systems, transformers, and auxiliary infrastructure, likely using onsite mobile cranes;
- Construction works to include civil works, electrical works and mechanical works for the development of the substation and building infrastructure, etc.; and
- Decommissioning of temporary facilities.

Figure 5: Loading and Transportation of BESS Components

2.4.3 Operation Phase

- BESS projects generally require regular preventative, predictive, and corrective maintenance as recommended by the Original Equipment Manufacturer (OEM).
- Maintenance activities are performed on a weekly, monthly, semi-annual, and annual basis to ensure optimal performance and safety.
- The BESS facility will maintain interconnection to the grid continuously, except during interruptions or maintenance periods, with the system actively charging and discharging for approximately 8 hours daily.
- Maintenance will also take place through a dedicated team. Typical routine maintenance period for a modern BESS is approximately 40 hours per year. Non-routine maintenance may be of a similar order. Although minimal maintenance activities may include battery system checks, thermal management system servicing, inverter and electrical component inspections, software updates, and safety system testing.

2.4.4 *Decommissioning Phase*

According to the CPA that was signed between the Egyptian Electricity Transmission Company (EETC), the Developer and the Ministry of Electricity and Renewable Energy, the Project is expected to be operational for 20 years. In the case of complete decommissioning of the BESS, the battery enclosures and associated equipment will be taken down, disassembled into components, and removed from the site.

Prior to transportation, the system will be fully de-energized, and all components appropriately packaged to ensure safe handling. Depending on their condition, battery modules and systems may be refurbished for use in other projects or sent for final disposal or recycled in accordance with applicable environmental regulations. Foundations will typically be removed, and excavated areas will be backfilled and restored with gravel or vegetation. Internal road networks may be retained, while gates and fences, including those surrounding the substation and battery units, will be dismantled.

2.5 Project Schedule

As stated by the Developer, the Project schedule includes a Planning and Design phase during Q1 2026, followed by Construction from Q1 2026 to Q1 2027. The Commercial Operation Date (COD) is expected in Q1 2027. The Project is designed to operate for a period of 20 years following the start of operations.

2.6 Workforce Requirements

The estimated workforce required for the Project during the construction and operation phases is as follows; however, this will be confirmed at a later stage of the Project.

- Around 380 job opportunities, at peak during the construction phase for a duration of approximately 12 months. This will mainly include 80 skilled job opportunities (to include engineers, technicians, consultants, surveyors, etc.) and 300 semi-skilled and unskilled job opportunities (such as laborers, security personnel, housekeeping, etc.).
- Around 30 full time job opportunities during the operation phase for a duration of 20 years. This will include around 20 skilled job opportunities (such as engineers, technicians, administrative employees, etc.). and 10 unskilled job opportunities (such as security personnel, drivers, etc.).

The Developer is committed to adhering to transparent recruitment procedures which include local community members. In addition, the Developer is aiming to hire local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs, where community members have the prerequisite skills and qualities for the job. Recruitment will be undertaken in accordance with Egyptian law, on fair assessment of skills and qualities for the job. All employees will be subject to normal human resource practices and will have to conduct themselves in accordance with the Developer's disciplinary code. No discrimination on ethnicity, gender, race or other such demographic factors will be allowed during recruitment. The only preferential factor shall be the fact those that are directly affected, subject to meeting all the prerequisites for recruitment of the specific job.

3. REGULATORY CONTEXT

3.1 Egyptian Stakeholder Engagement Requirement and Legislation

In Egypt, stakeholder consultation and engagement requirements are generally linked to the Environmental and Social Impact Assessment (ESIA) process, as mandated by the Law of Environment No. 4 of 1994 and its amendments under Law No. 9 of 2009. The ESIA system, as outlined in the latest executive regulations and Ministerial Decree No. 26 of 2016, classifies projects into four categories based on the severity of potential impacts and the project's location relative to residential areas.

BESS development projects are not currently listed in the project classification categories. However, during consultations with EEAA, it was decided that standalone BESS projects will be categorized as "Category B – Scoped Study," which encompasses projects with limited environmental impacts. For Category B projects, stakeholder consultation and/or engagement activities are not required. In contrast to Category C projects—those requiring a comprehensive ESIA—must include consultations with key stakeholders, including local communities, as part of a public consultation process.

3.2 Lender Environmental and Social (E&S) Requirements

The Developer will be seeking financing for the Project from IFIs – mainly the European Bank for Reconstruction and Development (EBRD). Therefore, the Developer wishes to design and manage the Project in accordance with good international industry practice and standards. This SEP meets international best practice requirements to include the relevant EBRD E&S Requirements (ESRs).

EBRD's ESR 10 is related to Stakeholder Engagement. The EBRD considers stakeholder engagement as an essential part of good business practice. In particular, effective community engagement is central to the successful management of risks and impacts on communities, as well as central to achieving enhanced community benefits. The requirement entailed identifying people or communities that are or could be affected by the Project, as well as other interested parties; ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation; and maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

EBRD ESR 10 sets out the following requirements of stakeholder engagement during project preparation:

- A SEP must be developed and implemented for projects that are likely to have adverse environmental or social impacts and issues, tailored to take into account the main characteristics and interests of the affected parties and other interested parties.
- The first step in successful stakeholder engagement is for the client to identify the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or (ii) may have an interest in the project ("other interested parties"). Resources for public information and consultation should focus on affected parties, in the first instance.
- As part of the stakeholder identification process, the client will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. Where impacts are perceived, additional communication may be required to provide information and reassurance of the assessed level of impacts. An adequate level of detail must be included in the stakeholder identification and analysis so as to enable the Bank

to determine the level of communication that is appropriate for the project under consideration. Employees are always considered stakeholders.

- The Client will inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation.
- The Client will disclose relevant project information, as soon as available, to help stakeholders understand the risks, impacts and opportunities of the Project.
- The Client will establish a procedure for external communication, proportionate to the risks and potential adverse impacts of the project, which includes methods to receive and respond to external communications from project stakeholders.
- The Client will establish a stakeholder grievance mechanism, that is proportionate to the risks and potentially adverse impacts of the project, to be aware of and respond to stakeholder concerns about the Project in a timely manner.

Please refer to the Non-Technical Summary (NTS) for a comprehensive overview of the regulatory framework applicable to the Project, as well as the mitigation measures identified for each assessed baseline, including but not limited to visual and landscape, geology, hydrology and hydrogeology, land use, air quality, and noise, etc.

The link to the disclosed Project documents is provided in Section **Error! Reference source not found.** below.

4. IDENTIFICATION OF STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into the following main categories:

1. People and groups who will be directly or indirectly affected by the project (such as local communities);
2. People and groups who may participate in the implementation of the project (such as investors and lenders as well as workers); and
3. People and groups who are not affected by the project development per se may but have a possibility to influence and make decisions on implementation of the Project (such as Ministries or regulatory agencies).

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified in the course of the Project development and as a result of cooperation of the parties.

Table 2: Identified Groups of Stakeholders

Stakeholder Group	Description	Relevance
Stakeholders who may be directly or indirectly affected by the Project		
Local communities which as identified include: ▪ Zaafarana Village		This includes the following groups within the local communities specifically: ▪ Community Members: local community members have a vested interest in the Project due to mainly potential for job opportunities. In addition, local community members could be impacted by other potential negative impacts (e.g. worker influx etc.). ▪ Community Leaders – Head of Zaafarana Village: They are socially active members and known figureheads for local community members, who may or may not hold government positions. ▪ Business Community (local subcontractors): such groups have a vested interest in the Project due to potential procurement opportunities such as subcontracting works (e.g. civil works, provision of food and amenities, etc.) ▪ Other such as Ain Sokhna Resorts (Figure 6): community directly facing the Project site are considered also to be most relevant as they will be facing key impacts such as noise, dust, etc. Such impacts are discussed and identified within the ESIA. Figure below presents these communities in particular.

Stakeholder Group	Description	Relevance
Vulnerable Groups	Individuals or groups who may be disproportionately affected by Project activities or may face barriers to participation in engagement processes. Further detailed context is provided below.	To ensure inclusive engagement and that their specific concerns and needs are appropriately considered during Project planning and implementation.
Bedouin Groups	The key Bedouin group known in the area is the Ma'aza tribe, a tribe of Arabs that used to live in the mountain range to the west of the site as well as within the local governmental unit in Ras Ghareb. Currently, the Ma'aza tribe settle permanently in Ras Gharib town, Zaafarana and Wadi Dara and apply a type of customary ownership within the Project area lands which is known as 'Urfi Contracts' and 'Ghafra System'. Such tribes would be helpful in providing security and protection and could also have a vested interest in employment and procurement opportunities (such as security guards, provision of raw materials, provision of food supplies and water to the workers, etc.).	To ensure inclusive engagement and that their specific concerns and needs are appropriately considered during Project planning and implementation.
Stakeholders who may Participate in Implementation of the Project		
European Bank for Reconstruction and Development (EBRD)	International financial institution potentially providing financing for the Project.	Ensures the Project complies with the EBRD Environmental and Social Policy.
Investor / lender	Entities that will provide financing for the Project development.	They have interest in ensuring that the Project is developed and implemented in accordance with their E&S requirements and standards and will monitor the compliance of the Project against such requirements.
Workers	This includes all workforce including but not limited to workers from Developer team, workers from EPC Contractor, Project Operator and any involved subcontractors.	Issues related to labor and working conditions such as contracts, working hours, grievance mechanism, leaves, and other.
Stakeholders who may have a possibility to influence and make decisions on implementation of the Project and/or may have an interest in the Project		
National Governmental Ministries		

Stakeholder Group	Description	Relevance
The Egyptian Environmental Affairs Agency (EEAA) in Cairo	Entity authorized to regulate environmental management issues.	For this Project it will be responsible for reviewing and approving the ESIA study, issuing the environmental permit for the Project, as well as monitoring the implementation of the Environmental and Social Management Plan (ESMP) and compliance with other conditions of approval as applicable. This entity is also responsible for hazardous waste in the governorate is the regional branch.
Egyptian Electricity Transmission Company (EETC)	Entity that has signed the CPA with the Developer to be the off taker of electricity.	For this Project, they will also be responsible for designing, building and operating the associated interconnection facilities. This will include the Project's connection to the national grid which includes an Overhead Transmission Line (OHTL) or similar.
Egyptian Electric Holding Company (EEHC)	Entity responsible for the electrical power generation, transmission and distribution of electricity in Egypt.	For this Project, the EEHC oversees electricity generation, transmission, and distribution, coordinates power purchase agreements (PPAs), and facilitates grid connections.
New & Renewable Energy Authority (NREA)	Entity that acts as the national focal point for expanding efforts to develop and introduce renewable energy technologies to Egypt.	For this Project, NREA was the entity responsible for allocation of the land for the development of the Project. Also, they are entrusted to plan and implement renewable energy programs in coordination with national and international institutions.
Ministry of Tourism and Archaeology / Supreme Council of Antiquities	Entity that is responsible for the preservation and protection of the heritage and ancient history of Egypt, under which operates all inspector offices in the governorates.	For this Project, they are the entity that ensure development activities do not negatively impact cultural heritage sites. In areas near archaeological or historically significant locations, the Ministry is responsible for assessing potential risks, granting necessary approvals, and overseeing measures to preserve and protect antiquities during project implementation.
Ministry of Transport, Roads and Bridges	Official entity that oversees the development and maintenance of transportation infrastructure that supports project logistics.	They ensure access to project sites for the delivery of materials and equipment, coordinating the use of roads, and facilitating transport routes. Their involvement is crucial to minimizing disruptions and ensuring smooth transportation during construction and operation phases.
Local Government Ministries and District Authorities		
Suez and Red Sea Governorates	The Governorate's main role is supporting the Project in all aspects as required to include providing required permissions.	They key departments of the Governorate that are related to the Project include the following:

Stakeholder Group	Description	Relevance
		▪ Environmental Administration is responsible for monitoring compliance against environmental requirements along with EEAA; ▪ Roads Directorate: is responsible for services and development of external roads in the governorate and issuing permits for any construction work on the external roads; ▪ Public Health Directorate: provides health services and facilities to the local districts and ensures overall local community health and safety.
Ataqa District	The entity's main role is supporting the Project in all aspects as required to include providing required permissions.	The entity is responsible for administrative oversight as well as supervision and follow-up for monitoring compliance to environmental requirements along with EEAA and Aswan Governorate.
Suez Drinking Water & Wastewater Company	Entity responsible for water and wastewater management within the Governorate.	The party that will be responsible for providing the Project's requirements of water as well as disposal of wastewater.
Environment Department, Suez Governorate	The entity is responsible for overseeing waste collection, disposal, and recycling within Suez.	It ensures proper waste management during the construction, operation, and decommissioning phases of the BESS project. This includes handling construction debris, packaging materials. While ensuring compliance with local environmental regulations and promoting sustainable practices to minimize environmental impact.
Civil Defense, Suez Governorate	The ministry is responsible for preventing and responding to natural disasters, industrial accidents, and other emergencies to protect the population and national infrastructure.	Such entity must be coordinated with and notified of emergency response procedures related to the Project.
Ministry of Labor (Suez Governorate Manpower Directorate)	Official governmental entity responsible for setting labor policies and legislations as well as ensuring protection of labor rights and working conditions.	Has a vested interest in ensuring that labor rights and proper working condition are maintained for the Project in accordance with labor laws and regulations.
Ministry of Interior – Suez Governorate Security Directorate	Entity that is responsible for national and local security, as well as approving emergency response and firefighting plans for establishments/projects.	The entity ensures security and public safety throughout the project's lifecycle. This includes protecting the project site, safeguarding equipment, and maintaining order during construction and operation.

Stakeholder Group	Description	Relevance
NGOs		
Nature Conservation Egypt (NCE)	NCE is the Birdlife International partner in Egypt and is a member of the International Union for the Conservation of Nature (IUCN). Nature Conservation Egypt (NCE) is an Egyptian NGO working towards conserving Egypt's natural heritage and the promotion of its sustainable use, for the benefit of present and future generations.	Egypt's leading experts in the field of nature and biodiversity conservation, NCE is specialized scientific research, advocacy, education and outreach to support species, their habitats, and local communities. NCE works in partnership with local experts and governmental bodies, as well as international organizations and partnerships to ensure efficient collaboration for conservation within and across borders.
Other		
Media (Newspaper, Television, Internet)	Public dissemination of information related to the Project, including its environmental, health, safety, and social (EHSS) impacts and benefits, as well as potential updates and information regarding Project activities and developments.	

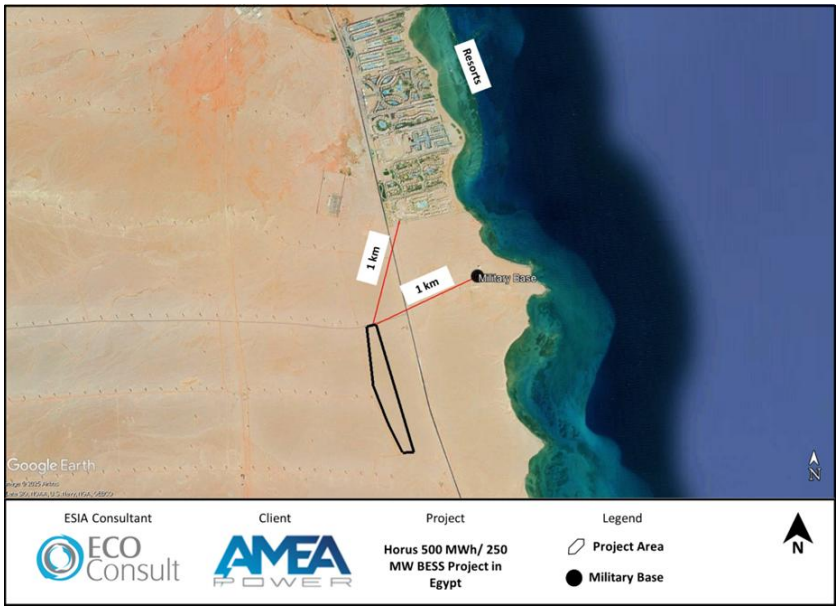

Figure 6: Project Area in Relation to Nearby Resorts and Military Base

Vulnerable People

A key stakeholder group to which particular attention must be considered during identification are vulnerable groups. Those are groups that, due to their socio-economic characteristics, may experience impacts more severely and/or disproportionally compared to the rest of the community members.

Vulnerable groups are project specific and depend on a range of issues which must be understood such as project location, socio-economic and demographic context, as well as the nature of the development and type of impacts anticipated. Vulnerable groups may be severely affected by the Project by virtue of their physical disability, social or economic standing, and limited education, lack of employment or access to land.

The key vulnerable groups within the context of the Project and their relevance are summarized in the table below.

Table 3: List of Vulnerable Groups and Their Relevance

Group	Relevance
Women groups	Could be considered vulnerable as cultural norms could limit their participation in the decision-making process in general that is related to the Project.
Disabled groups	Could be considered vulnerable groups mainly due to physical disability which could limit their access to information on the Project as well as participation in the decision-making process in general that is related to the Project.
People living in poverty / underprivileged communities	Could be considered vulnerable as their status could limit their access to information on the Project as well as participation in the decision-making process in general that is related to the Project.
The Aged	Could be considered vulnerable by limitations of access to participate in the Project related community decision-making process.
The Youth	Could be considered vulnerable due to their young adult, unmarried, non-asset owning status, yet likely to be savvier in 21st century technology than their elders, but may be unable to contribute in Project related community decision-making process, which will affect their generation more than most.

5. SUMMARY OF PAST STAKEHOLDER ENGAGEMENT ACTIVITIES

The table below provides a summary of all stakeholders that were previously consulted and engaged throughout the Project – mainly as part of the ESIA that is currently being undertaken for the Project. The table provides a summary of the stakeholder groups that were engaged and the main objective and outcome.

The objective of such consultations was to:

- Introduce the project (rationale, objective, location, key components, etc.);
- Explain and discuss overall methodology for ESIA Study;
- Explain and discuss key anticipated impacts as relevant; and
- Identify and determine additional requirements or key issues of concern to be taken into account for the ESIA study.

Throughout the consultations a handout was prepared and distributed to such stakeholder groups with key information to include but not limited to rationale for project, project location and setting, key components and activities of the Project and other as applicable.

5.1 Targeted Consultations

The table below presents a summary of the outcomes of the stakeholder consultations undertaken.

Table 4: Identified Groups of Stakeholders

Entity	Date	Key Outcomes
National Governmental Entities in Egypt		
Egyptian Environmental Affairs Agency (EEAA) Office in Cairo	11 Aug 2025 25 Aug 2025	▪ EEAA officials clarified that BESS projects are not yet included in the national classification system. However, EEAA indicated that the Project along with its OHTL will be classified as Category B – Scoped Study, and the survey methodology is considered sufficient. ▪ EEAA confirmed that the site is not within a declared protected area under Law 102/1983 is also not located within any proposed future protected areas such as the El-Galala El-Qeblyia that is around 10km to the southwest of the Projects. The ESIA should therefore assess potential biodiversity and habitat sensitivities, with particular focus on Important Bird Areas (IBAs) in the Gulf of Suez. Please note that this was undertaken as part of the biodiversity assessment, refer to Section 11.1 of the ESIA. ▪ EEAA advised that the biodiversity surveys should address IBAs, threatened species, habitat loss, and impacts on migration corridors, in line with Red Sea biodiversity survey requirements. However, it was also confirmed that the Project site is not located within any KBA or protected areas (existing or proposed) as per Law 102/1983[89]. ▪ The ESIA methodology covering construction, operation, and decommissioning phases was presented. No objections were raised, though EEAA will conduct a full review during the formal ESIA submission. ▪ EEAA requested that the ESIA define safety and sanitary setbacks (from residential areas, infrastructure, and facilities), with particular attention to fire safety and emergency access. Waste management (hazardous and non-hazardous) and occupational health and safety must also be comprehensively addressed. ▪ EEAA clarified that it does not issue non-objection letters. EEAA is the competent authority to review ESIA reports and issue environmental approvals upon submission through the relevant licensing entity.
EEAA Branch Red Sea Governorate	24 Aug 2025	▪ The Project site is geographically close to Zaafarana (administratively under Red Sea Governorate) but falls under the jurisdiction of Suez Governorate. ▪ The Project area may host a population of the Egyptian lizard, though no significant concerns were raised due to the long-standing use of the site for wind farms. ▪ The main ecological sensitivity relates to migratory bird routes along the Gulf of Suez, particularly if overhead transmission lines of considerable height and length are constructed. ▪ EEAA does not issue non-objection letters; EEAA is responsible for reviewing ESIA reports and issuing environmental approvals once formally submitted.
EEAA Branch Suez Governorate	7 Sep 2025	▪ The Project site, located in the Zaafarana Wind Farm area, falls under the administrative and monitoring authority of Suez Governorate. ▪ The main ecological sensitivity concerns migratory bird routes along the Gulf of Suez, particularly in relation to overhead transmission lines. ▪ Buffer zones and safety setbacks must be determined in line with the Egyptian Electricity Law and its executive regulations, which set clearance distances for electrical facilities and transmission lines. ▪ The ESIA methodology covering construction, operation, and decommissioning phases was noted without objections and will be reviewed in detail during formal submission. ▪ Safe distances between BESS facilities, nearby infrastructure, tourist facilities on the seacoast, and access roads must be identified, with particular attention to fire safety and emergency response. ▪ Suez Governorate has no dedicated hazardous waste landfill or treatment facility; waste from the Project must be transported to licensed national sites such as the Nasreya facility in Alexandria or other facilities approved by the Waste Management Regulatory Authority (WMRA). ▪ Data on hazardous waste facility capacities is managed centrally by WMRA; governorate branches do not maintain this information. Licensed facilities are expected to operate under international standards, with compliance verified by WMRA. ▪ EEAA Regional Branches serve only a monitoring and coordinating role; permits for transport, handling, and disposal of hazardous waste are issued exclusively by WMRA. ▪ All hazardous waste must be collected, stored, and transported in compliance with Law No. 202 of 2020 on Waste Management and its executive regulations. ▪ Transport of hazardous waste is limited to contractors licensed by WMRA and authorized to deliver materials to approved facilities. ▪ The ESIA must identify the types and estimated volumes of hazardous waste expected from the Project, together with the licensed disposal routes. ▪ Direct liaison with WMRA is required to confirm facility capacities, approved transport routes, and disposal arrangements. ▪ The ESIA should state that final disposal will typically be at the Nasreya facility in Alexandria or other WMRA-approved sites, with the final destination confirmed following WMRA approvals and contracts with authorized operators. ▪ A detailed logistical plan for the safe transport and tracking of hazardous waste must be included in the ESIA, aligned with WMRA approvals and in compliance with Law No. 202/2020 and its executive regulations. ▪ An assessment of flash flood and disaster risks in the Zaafarana area is required. ▪ EEAA does not issue non-objection letters; EEAA remains the competent authority for reviewing ESIA reports and issuing environmental approvals once formally submitted.
Egyptian Electricity Transmission Company (EETC) Egyptian Electricity Holding Company (EEHC)	11 Aug 2025 25 Aug 2025	▪ Buffer zones and safety setbacks discussed by EETC representatives, with clarification that Egyptian regulations (Electricity Law and executive regulations) set the clearance distances for electrical facilities and transmission lines as the primary national reference, while international financiers such as EIB and IFC require compliance with global safety codes (NFPA 855, UL 9540A, International Fire Code). The representatives were informed that the ESIA will reflect both national legal requirements and relevant international codes to ensure alignment with the expectations of regulators, financiers, and technical authorities. ▪ Concerns were raised regarding the effectiveness of the cooling systems in maintaining safe battery temperatures and preventing fire risks. Officials highlighted the need for the ESIA and the Emergency Response Plan to incorporate specific fire prevention and suppression standards, particularly as the Project site is located adjacent to existing renewable energy projects (solar and wind farms), which increases the importance of avoiding fire incidents. ▪ Officials emphasized that batteries and all related components are classified as hazardous waste under the Waste Management Law (Law No. 202 of 2020) and must be disposed of in strict compliance with national hazardous waste regulations and standards. ▪ The Project sit was highlighted as an area vulnerable to flash floods, which should be considered in project design and risk assessment measures. ▪ EETC representatives explained that detailed requirements for grid connection and energy storage operation are outlined in the Grid Connection Plan, which is part of the contractual framework between the Ministry of Electricity and the Developer.

[8] Law No 102 of 1983 for Nature Protectorates

[9] Protected Areas of Egypt: Towards the Future (EEAA)

Entity	Date	Key Outcomes
		▪ The non-objection letter is not issued by either EEHC or EETC; the Project development is instead based on the contractual agreement between the Ministry of Electricity and the Developer, which outlines the technical, financial, and regulatory requirements and constitutes implicit approval for Project development.
New & Renewable Energy Authority (NREA)	21 Aug 2025	▪ Officials confirmed that the Project site is located within lands under the jurisdiction of NREA, making NREA the competent administrative entity "land-owning authority" responsible for land allocation, facilitating project development, and reviewing environmental studies. ▪ Officials provided maps showing the location and total land area allocated for the Project site, formally designated for renewable energy projects through ministerial decrees and not allocated for other uses such as agriculture, industry, or housing. ▪ NREA officials clarified that the Authority does not issue a non-objection letter; project development is authorized through a formal land allocation contract granted to the developer, which serves as the legal basis for implementation. ▪ It was emphasized that the ESIA must comprehensively address decommissioning, particularly end-of-life battery management after 15–20 years of operation, including procedures for removal and safe disposal, estimates of hazardous waste volumes, and identification of licensed hazardous waste disposal facilities. ▪ It was also stressed that decommissioning requirements must be clearly incorporated into the ESIA, despite the long-term timeframe, to ensure future risks are adequately anticipated and managed.
Ministry of Labor (Suez Governorate Manpower Directorate)	7 Sep 2025	▪ The Directorate maintains a comprehensive database of university graduates across all fields of study and registered workers with intermediate and above-intermediate qualifications, which can be used to match the Project's employment needs with available local labor. ▪ All job vacancies required by the Project must be announced through the Governorate's official channels, including the official website and the Governorate's Facebook page, which serve as the authorized platforms for communicating vacancies. ▪ All workers must be fully insured in accordance with national labor legislation to safeguard their rights and ensure social protection. ▪ Adequate on-site facilities must be provided to protect workers' health and safety, including rest areas, sanitation, and access to safe drinking water. ▪ Opportunities for the employment of people with disabilities should be created wherever possible, in line with national employment policies and social inclusion objectives. ▪ The Labor Office expressed readiness to support the Project in sourcing qualified local labor through its databases, while underscoring that recruitment must follow official Governorate procedures.
Civil Defense, Suez Governorate	8 Sep 2025	▪ Officials confirmed that the Project site is located near a military unit belonging to the Armed Forces, situated across the Hurghada–Cairo Highway, making coordination with competent authorities essential to ensure compliance with permitting and security protocols. ▪ Civil Defense representatives explained that procedures for fire protection approval begin once land allocation is finalized, requiring the developer to submit a preliminary document package including the official land allocation letter, commercial registration, engineering site layout, fire safety consultant's report, and the protocol/contract signed with the Ministry of Electricity. ▪ Preliminary fire safety requirements are established following document review, while final approvals will be issued after site inspections and validation of firefighting system designs near project completion. ▪ Officials noted that the Egyptian Fire Code does not specifically address lithium-ion batteries; therefore, reliance on the Material Safety Data Sheet (MSDS) for the batteries and recognized international fire safety standards is required to guide fire protection design. ▪ Firefighting system design must ensure adequate firewater storage, pumping capacity, and compliance with national codes and international best practices for battery storage facilities. ▪ Officials highlighted the proximity of two fire engines, including one stationed on the Zaafarana–Galala Road near the Galala junction, which should be reflected in the ESIA's emergency preparedness and response plan. ▪ Civil Defense clarified that it does not issue non-objection letters; instead, its mandate is to review, approve, and certify fire protection and emergency response systems, requiring continuous coordination throughout Project development. ▪ Emphasis was placed on early coordination starting from land allocation, strict adherence to fire safety requirements, and alignment with both national codes and international standards due to the use of lithium-ion batteries.
Suez and Red Sea Governorates	25 Aug 2025 7 Sep 2025	▪ Meetings with the Urban Planning Departments of both Red Sea and Suez Governorates confirmed that the Project site falls fully within the jurisdiction of Suez Governorate, specifically within the Ain Sokhna area, Ataqa District. ▪ Red Sea Governorate acknowledged this outcome, confirming that the site does not fall under its territorial administration. ▪ Emphasis on the importance of early coordination with Suez Governorate to facilitate communication between the developer and relevant local authorities and administrative directorates. ▪ Advice that the Governorate can play a key role in easing communication with local communities to ensure orderly engagement and information sharing. ▪ Recommendation to engage directly with the Head of Ataqa District for further details and guidance on administrative and local considerations relevant to the Project. ▪ No additional administrative or planning concerns were raised; officials confirmed that further requirements would be communicated formally through the Governorate's established procedures.
Ataqa District - Suez Governorate	7 Sep 2025	▪ The Project site was confirmed to be located within Suez Governorate, specifically Ataqa District, with maps shared to demonstrate proximity to major facilities, administrative boundaries, and nearby settlements. ▪ Ataqa District was described as one of the largest districts in Suez Governorate, hosting the main industrial zone, major tourism and recreational areas on the Gulf of Suez coast, and the logistics hub of the Suez Canal Economic Zone, including Ain Sokhna Port. ▪ Coordination with authorities was emphasized as a requirement, to be channeled through Suez Governorate, which will direct Ataqa District to collaborate with the Developer and ensure communication with government entities such as the Water and Wastewater Company, waste management authorities, and permitting offices. ▪ Administrative approvals such as construction permits, waste management arrangements, and coordination for road use and municipal services, with procedural guidance, are important to be provided once applications are submitted. ▪ Workforce coordination to be facilitated through official job announcements, cooperation with the Labor Directorate, and support in identifying suitable worker accommodation. ▪ The importance of safe disposal of municipal solid waste and proper coordination with the Water and Wastewater Company was emphasized to ensure reliable utility services. ▪ The Developer should obtain an official letter from NREA, as the land-allocation authority, confirming the Project and recommending facilitation of cooperation. Such correspondence would guide local authorities in supporting Project activities. ▪ The Head of Ataqa District reaffirmed support for the Project, emphasizing adherence to legal procedures, strong coordination with the Governorate, and transparent communication with local stakeholders.
Suez Drinking Water & Wastewater Company	8 Sep 2025	▪ Potable water supply in Suez is primarily sourced from the Suez filtered plant and affiliated distribution systems, with strategic transmission to industrial and touristic zones along the Gulf of Suez corridor; local desalination plants are also used in selected resorts. Quality is managed to national standards; salinity and Total Suspended Solids (TSS) are monitored.

Entity	Date	Key Outcomes
		▪ For remote construction sites such as the Project site, water is typically arranged through scheduled tanker deliveries or temporary points agreed with the Company/Governorate to avoid burdening urban networks. ▪ Zaafarana village has no municipal sewer system; construction and operation sanitation should rely on mobile units with licensed collection and disposal at approved WWTPs in Suez urban/industrial areas. ▪ Wastewater facilities in Ataqa District operate to national standards and maintain sustainable technical management accreditation; plant capacities and loading will be reconfirmed during detailed coordination. ▪ The Company emphasized that before any trenching, piling, or road works, the Developer must submit method statements and detailed plans, undertake joint site inspections, and implement protective measures to safeguard Company assets. Permits and notifications will be routed via the Governorate and Ataqa District with Company sign-off. ▪ Construction water needs (dust suppression, batching, workforce camps) should be supplied through temporary tanker scheduling or designated temporary points; no permanent municipal connection is anticipated. Any permanent operational water (if required) would be minimal and must be separately justified. ▪ No objection was raised to accommodating the Project's temporary and intermittent construction water demand, subject to the submission of formal requests specifying required volumes to enable capacity assessment and the determination of technical and financial arrangements. ▪ Wastewater disposal at designated WWTPs may be considered, but only upon receipt of formal coordination requests and subject to verification of plant capacity and acceptance procedures at the time of implementation. ▪ The Company required strict planning of truck routes to avoid interference with resort access or industrial supply chains due to the remote location of the Project and the mixed industrial/touristic land uses in the Gulf corridor. ▪ Hazardous or chemically contaminated water (such as firefighting runoff) cannot be discharged into municipal sewers; such liquids must be managed as hazardous waste and handled exclusively through EEAA/WMRA-licensed contractors. ▪ Officials indicated that primary coordination and administrative requirements are to be undertaken through the formal chain of authority within the Suez Governorate, namely: Suez Governorate → Ataqa District → Suez Drinking Water and Sanitation Company (DWSC). In addition, liaison with the EEAA Regional Branch will be required to ensure compliance with environmental regulations, particularly in relation to the management of hazardous liquids. ▪ They highlighted that prior notifications will be required for road usage, night trucking, and any temporary road closures, to be coordinated with the Governorate and the Traffic Police. ▪ Temporary water supply should be arranged through tanker logistics or temporary connection points, while sanitary wastewater should be collected by licensed haulers and directed to approved WWTPs. ▪ The ESIA must explicitly address fire-water containment systems; any firefighting water contaminated with hazardous substances must be managed as hazardous waste under Law No. 202/2020 and Law No. 4/1994 and disposed of through licensed hazardous waste contractors. ▪ Firefighting water confirmed to be free of hazardous contaminants may be discharged into the wastewater system in line with national discharge standards. ▪ All permits, notifications, and approvals must be routed through Suez Governorate and Ataqa District, with the Company kept informed through formal correspondence.
Environment Department, Suez Governorate	8 Sep 2025	▪ Municipal solid waste in Suez is managed through designated dumpsites and sanitary landfills supervised by the Governorate, with the Suez Sanitary Landfill at an area called "km 5" serving as the main facility for safe disposal in accordance with national standards. ▪ Ataqa District and Ain Sokhna generate large volumes of domestic, industrial, and tourism-related waste, with coordination between the Governorate, local districts, and licensed contractors ensuring proper collection and disposal. ▪ Municipal and construction waste from the Project can be directed to Governorate-designated facilities such as the Suez Sanitary Landfill, subject to prior written requests specifying the type, volume, and frequency of waste. ▪ Disposal arrangements cannot be confirmed without such formal correspondence, and transportation must be carried out by Waste Management Regulatory Authority (WMRA)-licensed contractors, with official receipts confirming delivery to authorized sites. ▪ Construction and demolition waste may be accepted at designated facilities provided it is sorted and free of hazardous components; any hazardous or contaminated materials must be managed separately through EEAA/WMRA-licensed contractors in line with Law No. 202/2020 on Waste Management and its executive regulations. ▪ On-site accumulation of waste must be avoided, with regular collection and removal required to prevent environmental or health risks. ▪ All transportation must be undertaken by certified haulers, with receipts documenting final disposal at authorized sites. ▪ Hazardous waste and contaminated liquids must not be mixed with municipal waste streams and require management through hazardous waste protocols. ▪ Advance coordination with the Governorate and Ataqa District is required for significant waste transfers, particularly if night trucking or heavy vehicle movements are anticipated. ▪ Coordination must follow the chain through the Suez Governorate General Office, then the Ataqa District, and finally the Environment Department, with no direct disposal to municipal systems permitted without this process. ▪ The Department stated that through lessons learned from past infrastructure projects in Ain Sokhna and Ataqa, they highlight the importance of proactive communication with the Governorate to minimize risks of delay. ▪ The Governorate's solid waste system, centered on the Suez Sanitary Landfill, is in principle able to receive municipal and construction waste from the Project, subject to prior correspondence specifying waste type, volume, and frequency, and compliance with WMRA licensing requirements. ▪ Hazardous waste remains excluded from the municipal system and must be managed separately through EEAA/WMRA-licensed contractors.
Ministry of Tourism and Archaeology / Supreme Council of Antiquities	12 Aug 2025	▪ The Project area does not encompass any recognized archaeological sites, heritage assets, or areas under excavation. The nearest cultural landmarks are the monasteries of St. Paul and St. Anthony, located more than 35 km from the site, and several unregistered caves in the Red Sea mountains. The likelihood of encountering archaeological remains within the Project boundary is therefore considered low. ▪ The Ministry confirmed that the Project land is under the administrative control of NREA. However, in the event of chance finds or archaeological inspection requirements, supervisory and regulatory authority rests with the Suez Antiquities Directorate. ▪ No specific archaeological or cultural heritage surveys exist for the Project site beyond those undertaken for previous wind energy developments in the region. Publicly available information may be accessed through the Ministry of Tourism and Antiquities or the local Antiquities Inspectorates. ▪ Compliance is required with Law No. 117/1983 on the Protection of Antiquities (as amended), which obliges the Developer to: - Immediately suspend works upon discovery of antiquities. - Protect and safeguard the site until inspection by the competent Directorate.

Entity	Date	Key Outcomes
		- Resume activities only upon written clearance from the Antiquities Authority. ▪ The methodology for the archaeology and cultural heritage survey was presented which includes a desk-based research and field survey undertaken by an archeology expert. A chance find procedure was also outlined, covering immediate work stoppage, site protection, notification to the Suez Directorate, and investigation prior to clearance. The Antiquities Council endorsed this approach as consistent with national law and international standards. ▪ The Council required that chance find procedures must be integrated into contractor obligations. Monitoring may also be required during excavation works in areas identified as potentially sensitive.
Ministry of Interior – Suez Governorate Security Directorate	8 Sep 2025	▪ The Directorate emphasized the need for prior coordination with traffic police and security authorities for the transportation of oversized and high-value equipment. Route planning must consider Ain Sokhna Port and the Suez Canal corridor, where convoy escort or temporary road closures may be required. ▪ The Directorate requested the preparation of a site-specific emergency response plan, with clear points of contact for local police, fire services, and medical facilities. ▪ It was agreed that security coordination must involve both the Suez Governorate and the relevant security directorates in advance of construction activities and equipment transfers. ▪ The Directorate clarified that it does not issue “non-objection letters.”

5.2 Focus Group Discussions

The E&S Team undertook a series of consultation activities as part of a scoping visit. Two (2) FGDs were undertaken as follows:

- Session #1: Residents and Local Authorities – Zaafarana Village
- Session #2: Tourist Resorts – Ain Sokhna

At the beginning of each session, a presentation on the Project was first provided along with a handout on the following key topics.

- Description of the Project location along with maps;
- Description of key Project components along with figures and illustrations;
- Description of the key activities anticipated in each key phase of the Project (planning, construction and operation);
- Description of ESIA study and its key components and requirements;
- Explanation of key anticipated E&S impact under each phase of the Project; and
- Explanation of the methodology and scope of work that will be undertaken for the ESIA.

5.2.1 Residents and Local Authorities – Zaafarana Village

As discussed above, Zaafarana Village was identified as the closest local community. Zaafarana Village falls under the administrative jurisdiction of Ras Gharib City Council, Red Sea Governorate, and represents the closest settlement to the Project site. However, due to the limited capacity of the local unit building and lack of suitable venues within the village, the meeting was held at Ras Gharib City Council. The Head of the Council welcomed the session, and transportation was arranged by the E&S team to facilitate the participation of Zaafarana residents. This arrangement also reflected the fact that many residents of Zaafarana already work in Ras Gharib City and vice versa. The session included 27 participants, with gender breakdown of 15 male and 12 female participants as shown in Figure 7 below.

Attendees were invited through direct communication with the E&S Team and announcements through the head of the local unit for Zaafarana village.

The table below presents the key outcomes from the residents and local authorities of Zaafarana Village.

Table 5: Key Outcomes of FGD with Zaafarana Village Residents & Local Authorities

Community	Date	Key Outcomes
Zaafarana Village	24 Aug 2025	▪ Participants emphasized that priority should be given to Zaafarana residents for employment opportunities, followed by nearby communities. While recognizing that the Project is not labor-intensive, participants emphasized the importance of creating local jobs and training, particularly for youth, to strengthen community acceptance given the very limited job market in the village. ▪ Community acceptance was noted to depend on tangible local benefits; participants requested social support programs similar to those implemented by other energy projects in Ras Gharib.

Community	Date	Key Outcomes
		▪ Requests were made for contributions to healthcare, education, and basic services in Zaafarana, with participants stressing that even small contributions would have significant value. ▪ Concerns were raised about high soil salinity near the Red Sea coast and its potential impact on underground power cables, which should be addressed in Project design. ▪ The risk of flash floods, although infrequent but severe, was highlighted and should be integrated into engineering and emergency planning. ▪ Concerns were expressed about increased dust, noise, and traffic during the construction phase, and the potential risks posed to residents. ▪ Questions were raised regarding emergency preparedness and the ability to respond to incidents such as fires or accidents given limited local capacity. ▪ Ras Gharib City Council and Zaafarana Local Unit were identified as the primary channels for engagement, disclosure, and grievance management, with ongoing communication considered essential to maintain transparency and trust.

Figure 7: FGD Residents and Local Authorities

5.2.2 Tourist Resorts – Ain Sokhna

In addition to community-level consultations in Zaafarana, the E&S Team also engaged with the Tourist Resorts stakeholders in Ain Sokhna, given their proximity to the Project site. Four (4) resorts were approached to participate in the consultation process. Only Regina Beach Resort, the closest to the Project site, agreed to host a discussion. The remaining resorts did not express interest in attending; however, the E&S Team formally delivered the Project handout to the security offices of each resort for reference.

Initial contact was made by phone to introduce the Project and confirm interest. A printed handout was then delivered to the resort management to provide background information and confirm the meeting schedule.

Table 6: Key Outcomes of FGD with Regina Beach Resort

Community	Date	Key Outcomes
Tourist Resorts – Ain Sokhna	25 Aug 2025	▪ Participants expressed significant concern about the operational risks of BESS units, considering them potentially high-hazard facilities if not properly managed. ▪ Questions were raised regarding the existence of a comprehensive Emergency Response Plan, particularly addressing fire risks associated with lithium-ion battery systems. ▪ The resort's Safety Officer noted that local firefighting capacities are limited and not equipped to handle battery fires, emphasizing the need for specialized equipment, trained personnel, and coordination with civil defense. ▪ Concerns were raised about operational noise from cooling systems, inverters, and transformers, which could disrupt the quiet environment of resorts and affect guest experience. ▪ Participants requested clear assessments and mitigation measures for potential electromagnetic field (EMF) impacts on workers and nearby communities. ▪ The area's history of occasional flash floods was highlighted, with participants insisting that flood risk must be explicitly integrated into Project design and risk management measures. ▪ Increased heavy truck traffic along the Zaafarana–Hurghada Road, the main access route serving the resorts, was identified as a safety concern that could impact tourist mobility. ▪ Participants stressed that the Project's visual profile must not undermine the touristic character of Ain Sokhna, requiring design measures that blend infrastructure with the coastal environment. ▪ Establishing continuous communication between the Project team and resorts was recommended to provide timely updates on activities affecting tourism operations, guest safety, and infrastructure.

6. FUTURE STAKEHOLDER ENGAGEMENT STRATEGY, PLAN AND RESPONSIBILITIES

The table below identifies the stakeholder engagement strategy and plan to include stakeholders relevant to the Project (as identified in earlier under Table 4), objective of consultation with each group, the communication methods and tools, time frame and responsible entity for undertaking such consultations.

A Project Stakeholder Register will be updated monthly for the Project which serves as a log for all consultation and engagement undertaken for the Project. This shall be reviewed and updated regularly by the assigned Social Manager. A template is provided in “Section 11.4” which will be used either in Microsoft Word or Excel format.

Table 7: Future Stakeholder Engagement Activities

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Stakeholders who may be directly or indirectly affected by the project				
Local communities which as identified earlier includes: ▪ Zaafarana Village	1. Announce key project milestones 2. Updates on project construction schedule and phasing 3. Announce stakeholder grievance mechanism 4. Setup employment and procurement procedure 5. Updates on employment and procurement opportunities 6. Updates on stakeholder engagement activities 7. Updates on E&S management plan implementation 8. Educate on key E&S risks 9. Potential risks of influx, and how influx-related impacts are to be monitored and controlled. 10. The presence of security personnel and the steps taken to ensure their good behavior towards local people. 11. Obtain Feedback	1. Undertake consultation sessions with the local community which will include two (2) sessions as follows: ▪ Two sessions (one male and one female) in Zaafarana Village.	Semiannually during Construction Annually during Operation	Developer Social Manager along with EPC Contractor CLO (as applicable)
		▪ Prepare and distribute adverts/flyers with key update messages to local communities. This should include Zaafarana Village. ▪ Information may also be shared through online channels (e.g., social media platforms and relevant online job or information portals), as appropriate.	Quarterly during construction Annually during operation	Developer Social Manager along with EPC Contractor CLO (as applicable)
		2. Publish SEP in English and Arabic language online with hard copies at the Suez Governorate office (given that the Project is located administratively within the Suez Governorate), and Zaafarana Village.	Once / to be checked monthly to ensure documentation is in place	Developer Social Manager along with EPC Contractor CLO (as applicable)
Vulnerable Groups to include Women and youth groups		Local community session will target female and youth representatives. Engagement with vulnerable groups will be facilitated through appropriate communication channels and community liaison mechanisms. Engagement activities will consider factors such as accessible meeting locations, appropriate timing of meetings, and suitable communication methods to ensure participation of potentially vulnerable groups. In specific at the end of the local community session a focus groups will be held with women attendees to obtain any feedback and provide any additional information required in specific.	Once every 6 months during construction Once every year during operation	Developer Social Manager along with EPC Contractor CLO (as applicable)
Bedouin Groups	Disclosure of Stakeholder Engagement Plan (SEP) including grievance mechanism.	1. Individual targeted meetings with tribal leaders of such groups to explain SEP and grievance mechanism	Annually during construction and operation	Developer (CLO)
	Updates on the Project including environmental and social issues and CSR activities undertaken	2. Prepare and distribute leaflet in Arabic with updates on Project including environmental and social issues. This could include updates on the Project development, number of employment opportunities allocated for local communities, the bidding process for Project components, construction plans, updates on CSR programs implemented, etc.	Quarterly during construction Annually during operation	Developer (CLO)
Tourist Resort in Ain Sokhna	Provide information on Project activities and address any concerns related to Project operations	1. Email communication, meetings (as required)	Annually during construction and operation	Developer (CLO)
Stakeholders who may participate in implementation of the project				
Investor/Lender - EBRD	Updates on the Project including environmental and social issues (e.g. environmental performance, grievance mechanism implementation, community integration plan, etc.)	1. Individual/Internal Meetings (if required)	TBD	Developer E&S team as applicable
		2. Submission of Annual E&S Monitoring Report (AMR).	Annually	
Workers	Provide updates on contract requirements on employment to include duration, salary, leaves, etc.	1. Individual/Internal Meetings	Upon employment	Developer Team as applicable / EPC Team as applicable
	Provide explanation on worker grievance mechanism	1. As part of Induction Training 2. As part of Toolbox Talks	Upon employment / continuous	
	Provide general/specialized training requirements as applicable to include but not limited to induction, Toolbox Talks (TBT), occupational health and safety, waste management, etc.	1. As per training plan to be developed	Upon employment / continuous	
Stakeholders who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project				
Central and Local Government				
1. Egyptian Environmental Affairs Agency (EEAA)	Some governmental stakeholders might require to undertake certain inspections or auditing exercises and/or	1. Individual/Internal Meetings (if required)	Upon occurrence	Developer team as applicable

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
2. Egyptian Electricity Transmission Company (EETC) 3. Egyptian Electric Holding Company (EEHC) 4. New & Renewable Energy Authority (NREA) 5. Ministry of Civil Aviation 6. Ministry of Antiquities 7. Ministry of Interior 8. Ministry of Transport, Roads and Bridges 9. Suez Governorate (EEAA Branch, Environmental Department, Labor Office, Roads Directorate, Public Health Directorate, Civil Defense) 10. Ataqa District Office 11. Zaafarana Village 12. Suez Drinking Water and Wastewater Company 13. Suez Supreme Council of Antiquities	might require certain updates/information on the implementation of the project	2. Correspondence and official letters (if required)	Upon occurrence	Developer team as applicable
General Authority for Roads & Bridges and Land Transport	Obtain approval on the traffic management requirements and consultation on transport and traffic management plan.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction	EPC Contractor
Egyptian Environmental Affairs Agency (EEAA)	Coordination for list of private contractors approved for collection of hazardous waste from the site to approved facilities	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Environment Department in Suez Governorate	Coordination for list of private contractors approved for collection of solid waste from the site to approved facilities	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Suez Governorate – Labor Office	Determine and agree on the key principles and methodology implementation for the local recruitment and procurement procedure including identification of priority for employment for Zaafarana Village and Ataqa District.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	When required during construction and operation	EPC Contractor / Project Operator
Suez Drinking Water and Wastewater Company	Coordination for list of private contractors approved for collection of wastewater from Project site.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
	Coordination to secure the water requirements of the Project (if required)	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Supreme Council of Antiquities	Reporting and communication in case archeologically remains are found through construction of project along with chance find procedures implemented.	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Upon occurrence	EPC Contractor
Civil Defense, Suez Governorate	Present Project, location and emergency plans to take into account any relevant requirements. In addition, coordinate for any emergency response requirements related to incidents on site, including workshops or coordination meetings with relevant authorities on battery fire response and emergency preparedness.	1. Individual/Internal Meetings (if required) 2. Correspondence and official letters	Once before commencement of construction Once before commencement of operation	EPC Contractor Project Operator
"km 5" Sanitary Landfill	Coordination to dispose of non-hazardous solid waste according to the facility's current capacity	1. Individual/Internal Meetings (if required) 2. Correspondence and Official Letters	Once before construction Once before operation	EPC Contractor/ Project Operator
Non-Governmental Organizations (NGOs) and Other Organizations				

Stakeholder	Objectives	Communication Methods and Tools	Timeframe	Responsibility
Nature Conservation Egypt (NCE)	1. Announce key project milestones 2. Announce stakeholder grievance mechanism 3. Obtain feedback	1. Prepare leaflet and submit to these entities as applicable in relation to their specific focus with key E&S updates. Or this could be part of a general E&S update leaflet prepared.	Semi-annual during construction (every 6 months) Annually during operation	Developer Social Manager along with EPC Contractor CLO (as applicable)

7. STAKEHOLDER GRIEVANCE MECHANISM

The Developer understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders. Monitoring grievances will signal any recurrent issues or escalating conflicts and disputes.

The Developer will implement a Grievance Mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. The Developer will accept all comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Egypt.

The Developer will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. The Developer will also report regularly to the public on the grievance mechanism implementation, protecting the privacy of individuals.

The figure below presents a process diagram for the stakeholder grievance procedure which is further explained throughout the section below.

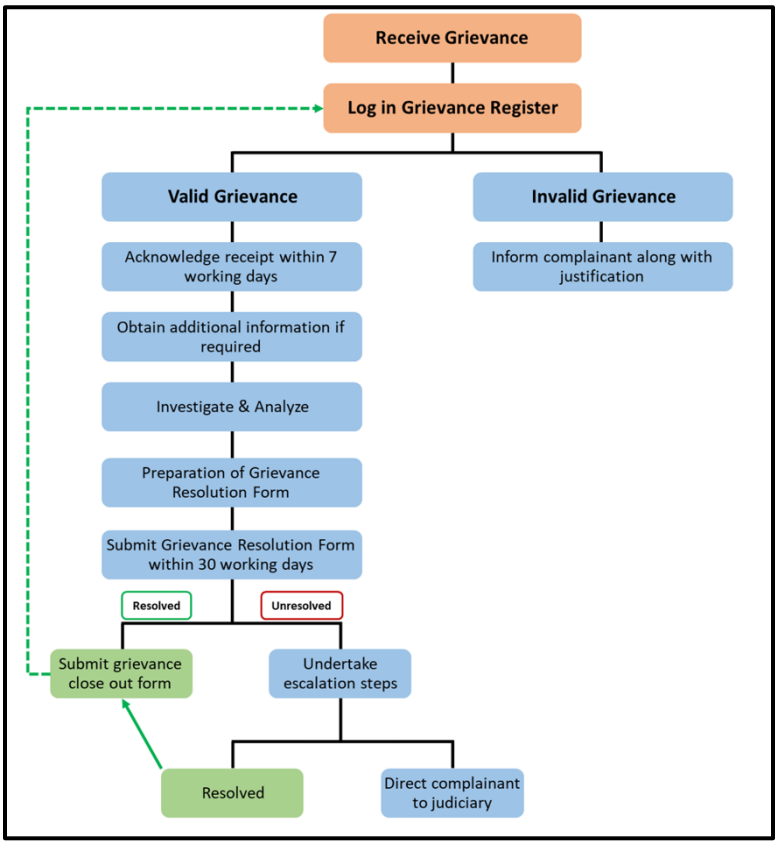

Figure 8 : Grievance Mechanism Process Diagram

7.1.1 Stakeholder Grievance Procedure

- A Grievance Disclosure Sheet will be disclosed at key locations below. The Grievance Disclosure Sheet will inform the local communities on how and where to lodge a grievance in accordance with step 2 below.
  - Zaafarana Village – Local Unit Office
  - Ataqa District Office
  - Entrance Office of the Project
- Stakeholders willing to lodge a grievance should be able to use the following avenues:

  A. *Grievance sheets (Annex 1) with grievance boxes will be made available at the following locations*:

  Project Office

  Location: Suez Governorate, within Ataqa Qism (district), Ain Sokhna Shiyakha, near the eastern boundary of the Zaafarana Wind Farm.

  Telephone: +20 10 61595388

  Zaafarana Village – representative

  Name : Amman Dardery

  Phone : 01018394839

  B. Direct Contact through the following:

  Social Manager

  Telephone: +20 10 61595388

  E-mail: asmaa.gahalla@abydossolar.com

  C. Developer website at the following link:

  Link: https://www.ameapower.com/

- All grievances (whether submitted through a grievance form, e-mail, telephone, etc.) will be recorded on a grievance log sheet by the Social Manager (Annex 2).
- This mechanism is applicable for any project related stakeholder group to raise a grievance. This includes but not limited to national / regional governmental entities, local communities, Non-Governmental Organizations (NGOs), media, research, and academic institutions, and others. This mechanism addresses grievances related to the following:

- Any grievance related to Project activities to include but not limited to: (i) damage to public / private assets; (ii) degradation / deterioration of local infrastructure (e.g. roads); (iii) disturbance from noise, dust, traffic accidents, pollution, excessive speed of project's vehicles; (iv) degradation of the environment; (v) disturbance to land uses, (vi) other similar issues.

- Any grievance against involved person/entity in the project to include but not limited to the Developer, EPC Contractor, subcontractors, and suppliers. This could include but not limited to: (i) negative behavior of construction workforce towards local communities; (ii) misconduct of security service providers; (iii) inappropriate behavior of workers in terms of managing employment and procurement opportunities, (iv) other similar issues.

- However, the following grievances will not be addressed in the case they are submitted. In this case, the applicant will be informed that the grievance will not be addressed along with a justification. This includes the following in particular:

  - Grievances that are not related to the Project or its activities

  - Grievances against an entity / person / worker that is/was not involved in the Project in any way directly or indirectly

  - A complaint that is currently being reviewed by the judiciary system and/or for which a final and definitive court ruling has been issued

- Grievance procedure starts with formal acknowledgment in accordance with the preferred method of communication specified by the complainant within 7 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

- In coordination with the relevant personnel, the Social Manager will analyze the root cause of the grievance, investigate if the grievance is correct or not, and identify the required actions to be implemented to deal with the issue and identify the timeline for their completion (if applicable). For other more complex grievances, third parties could be involved in the investigation as applicable. Specific examples on this includes the following:

  - Grievances that entail safety concerns such as personal threats. Such grievances might require the involvement of local Police

  - Grievances that entail damage to property which have been verified might require an assessment of the damaged asset with the support of an external specialist in agreement with the complainant.

- The Social Manager will prepare a grievance resolution form (see Annex 3) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. Grievance resolution form will be submitted within (30) days of receiving the grievance.

- The grievance resolution form, including the necessary budget to resolve the grievance, must be approved and signed-off by the Project Manager.

- The outcomes of the grievance resolution form will be communicated to the complainant by the Social Manager in accordance with the preferred method of communication specified.

- In case the grievance resolution form identifies proposed actions to be implemented, the Social Manager will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form. The Social Manager will contact the complainant once such actions are completed in accordance with the preferred method of communication specified.
- The Social Manager will ensure that the grievance forms, grievance log sheet, and grievance resolution form are always updated and maintained onsite.
- The grievance mechanism will be implemented promptly and at no cost and without retribution to the party that originated the issue or concern.
- The use of the grievance mechanism shall not impede access to judiciary means.
- The grievance mechanism allows submission of anonymous complaints by community members.
- In the case the complainant does not accept the proposed resolution the following steps will be undertaken:
    - The Social Manager will raise the issue to the Project Manager for discussion and adoption of new resolutions for the grievance.
- In the case the complainant does not accept the new resolution, the Project Manager will raise the issue to the E&S Department at headquarters for discussion and adoption of new resolutions for the grievance. Where necessary, the grievance may be further reviewed by senior management. If the grievance remains unresolved, the complainant will be informed of available external grievance mechanisms, including those of relevant authorities or applicable lenders.
    - In the case the complainant does not accept the new resolution proposes, the compliant will be asked to access judiciary means to resolve his/her grievance.

7.1.2 Stakeholder Grievance Mechanism for Gender Based Violence, Sexual Harassment and Sexual Exploitation and Abuse

The requirements set below are considered applicable for handling grievances related to the following and in accordance with the requirements set within the "Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works" (2018, World Bank).

- Violence Against Women and Girls (VAWG): defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life
- Gender-based Violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. Women and girls are disproportionately affected by GBV across the globe.
- Sexual Exploitation and Abuse (SEA): any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily,

socially, or politically from the sexual exploitation of another. Sexual abuse is further defined as "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." Women, girls, boys, and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.

For the above complaints, there are risks of stigmatization, rejection, and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Therefore, the following steps should be considered for any grievances related to the above.

- The Social Manager will receive appropriate training from an authorized GBV Service Provider on how to collect GBV cases confidentially and empathetically (with no judgement). It is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs, and wishes are prioritized in every decision related to the incident. The survivor who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.
- Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
- No identifiable information on the survivor should be stored including in particular the grievance log register. In addition, if a grievance is submitted through a grievance form it will be kept confidential.
- Should the grievance be received by the Social Manager through a grievance form, telephone, email or other, the Social Manager should not ask for, or record, information on more than three aspects related to the incident and which include the following:
  - Nature of the complaint (what the complainant says in her/his own words without direct questioning)
  - If, to the best of their knowledge, the perpetrator was associated with the project; and,
  - If possible, the age and sex of the survivor.
- The Social Manager should assist the survivor by referring them to the GBV Services Provider for support immediately after receiving a complaint directly from a survivor. It is up to the survivor, and only the survivor, whether to take up the referral.
- The GBV Services Provider provides the necessary support to the survivor until it is no longer needed. Survivors may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes.
- The Social Manager will immediately notify the Project Manager (if the consent of the survivor is obtained). The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes.
- The Social Manager, Project Manager and GBV Services Provider will meet immediately to agree on a plan for resolution as well as the appropriate remedy for the perpetrator in accordance with the below. Note: The survivor must give the service provider representative consent to participate in the resolution mechanism on her/his behalf.

- Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
- Refers the case to the police as appropriate (see note below).
- Assigns the appropriate 'Focal Point' to implement the actions—with the assistance of the GBV Services Provider.
- Upon resolution, the Focal Point and GBV Services Provider advise that it has been resolved, who in turn advise the Social Manager.
- The Social Manager notes the resolution and closes the cases and submits a close-out report to the Project Manager who in turn reviews and approves the report.

- All entities involved above in case resolution, need to understand their legal obligations when it comes to reporting cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.
- If a case is first received by the GBV Services Provider, a report should be sent to the Social Manager to ensure it is recorded in the system. If any follow up is required by the Social Manager, it will be provided immediately with the consent of the survivor as applicable.
- If the survivor does not wish to place an official complaint through the grievance mechanism, the complaint is considered closed.
- If the alleged perpetrator is an employee of the Developer, EPC Contractor, or subcontractor, to protect the safety of the survivor, and the workplace in general, the worker, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor. Reasonable adjustments should be made to the alleged perpetrator's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary.

8. CONTACT DETAILS

Throughout the Project, all stakeholders can contact the Developer throughout the contact details provided below.

Contact Details for the Public

Social Manager
Name: Asmaa Gahalla
Telephone: +20 10 61595388
Email: asmaa.gahalla@abydossolar.com

The Developer intends to provide all relevant information to the public (in Arabic and English) and which will include but is not limited to the following:

- Environmental and Social Impact Assessment (ESIA);
- Stakeholder Engagement Plan (SEP) (this document)
- Non-Technical Summary (NTS)

The above will be provided at the Developer's website at the following link below:

www.ameapower.com

In addition, hard copies of the above will be available at the following locations. These documents will remain in the public domain for the duration of the Project and will be updated as appropriate:

- **Project Office**
  Location: Suez Governorate, within Ataqa Qism (district), Ain Sokhna Shiyakha, near the eastern boundary of the Zaafarana Wind Farm.
  Telephone: +20 10 61595388

- **Zafarana Village – representative**
  Name: Amman Dardery
  Telephone: 01018394839

- **Red Sea Governorate office**
  Location: AbdelAziz Mostafa street- Hurghada
  Phone: 002 065 3547555
  002 065 3546796
  Mobile : 01201968777

9. MONITORING AND REPORTING

9.1 Monitoring Requirements

The following monitoring requirements will be undertaken by the Social Manager with regards to the implementation of the SEP:

- Weekly inspections will be undertaken: (i) at stakeholder grievance boxes to collect any grievance forms, and (ii) review of grievance log updates.
- Monthly inspections will be undertaken to ensure: (i) SEP is disclosed in hard copy at required locations; (ii) summary advertisements of grievance mechanism are available at local community platforms.
- Submission of minutes of meetings as per SEP implementation.
- Quarterly inspections will be undertaken to: (i) ensure project update leaflets are available at local community platforms; (ii) stakeholder grievance boxes and forms are available at designated locations.
- Monitoring requirements are to be updated once available for implementation of the local employment and procurement procedure as well as the social responsibility program. This could include for example submission of employment and procurement databases, proof of announcement advertisements, etc.

Monthly audits will be undertaken by the SPV, covering both HSE and social aspects. These audits will include an updated Grievance Log and will be submitted to AMEA Power as part of the monthly reporting requirements.

9.2 Reporting Requirements

The following reporting requirements will be prepared by the Social Manager with regards to the implementation of the SEP:

- On a monthly basis the stakeholder register form will be submitted as provided in Annex 4.
- On a monthly basis the stakeholder grievance form will be submitted as provided in Annex 2.
- The SEP will be updated and resubmitted on a semiannual basis during the construction phase and on an annual basis during the operation phase.
- The following Key Performance Indicators (KPI) will be reported monthly:

No.	KPI	Measurement Action
1	Number of stakeholder engagement activities undertaken	All communication to be reported in stakeholder register
2	Number of stakeholders involved	All communication to be reported in stakeholder register
3	Number of vulnerable groups engaged (including women groups)	All communication to be reported in stakeholder register
4	Number of requests for information via websites, CLOs and local information centers	All communication to be reported in stakeholder register
5	Number of stakeholder valid grievances submitted (and number rejected as outside of scope)	All grievances to be reported in grievance register

No.	KPI	Measurement Action
6	Number of resolved stakeholder grievances	All grievances to be reported in grievance register
7	Number of stakeholder grievances related to GBV	All grievances to be reported in grievance register
8	Average time for resolution of stakeholder complaints	All grievances to be reported in grievance register
9	Type of stakeholder grievances submitted	All grievances to be reported in grievance register

10. ROLES AND RESPONSIBILITIES

This section identifies the roles and responsibilities for the key personnel involved in the implementation of this plan.

Project Manager – Developer

- Ensure resources required (budgetary, human, and logistical resources) are available for the implementation of this Stakeholder Engagement Plan
- Oversee the overall implementation of this Stakeholder Engagement Plan, including frequent interfacing with the Social Manager.
- Participate in implementation of the requirements of the stakeholder grievance mechanism as applicable to include signing grievance resolution forms.

Social Manager – Developer

- Update the SEP as required during the Project's lifetime, to include planning, construction, operation, and decommissioning.
- Overall responsibility for implementing the requirements of the stakeholder engagement plan as identified
- Overall responsibility for implementing the requirements of the stakeholder grievance mechanism to include distribution of grievance disclosure sheets, collection of grievance forms, updating grievance log sheet, filling grievance resolution forms and grievance close-out forms.
- Coordinate with the EPC Contractor's team / oversee the implementation of the EPC Contractor and its subcontractors of all requirements related to SEP.

EPC Contractor / Project Operator

EPC Contractor will be required to appoint a CLO that will have the following roles and responsibilities:

- Implementing the requirements of the stakeholder engagement plan as identified within the SEP as they primarily under EPC Contractor's responsibility. Those are mainly related to those requirements for the project that are mainly with governmental entities such as securing water requirements, assigning authorized waste collectors, etc.
- Support the Developer's Social Manager, as requested, in implementing SEP requirements that fall under their responsibility. This could include, but is not limited to, assisting with local community sessions, messaging updates, and the preparation and distribution of advertisements or flyers, etc.
- Submission of proof of completion of required engagements to the Project Developer's Social Manager.

Note: The EPC Contractor and its subcontractors(s) will have no role in the implementation of the stakeholder grievance mechanism. Any complaints received directly or indirectly by any EPC or subcontractor staff shall be redirected to the Developer's Social Manager.

11. ANNEXES

11.1 Annex 1 – Grievance Form

PUBLIC GRIEVANCE FORM

Reference No.	
Full Name: ***(Anonymous submission is allowed)***	
Contact Information Please mark how you wish to be contacted and add contact details	☐ **By Post:** ☐ **By Telephone:** ☐ **By E-mail:** ☐ **Other (please specify)**
Description of Concern, Incident or Grievance	**What is your concern/grievance/what happened? Where did it happen? Who did it happen to? What is the result of the problem?**
Date of concern, incident, or grievance	
☐ **One-time incident/grievance (date)** ☐ **Happened more than once (how many times?)** ☐ **On-going (currently experiencing problem)**	
What would you like to see happen to resolve the problem?	
Signature:	**Date:**

11.2 Annex 2 – Grievance Log Sheet

Grievance Log Sheet

Ref No.	How Was grievance submitted	Date of Submission of Grievance	Name and Contact Information	Description of Grievance	Actions Taken to Resolve the Grievance	Date of Communication of Solution	Has grievance been resolved (Y/N) if not explain why

11.3 Annex 3 – Grievance Resolution Form

GRIEVANCE RESOLUTION FORM

How was grievance received	
Reference No:	
Description of Concern, Incident or Grievance: *What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?*	
Date of Grievance	
Has the Grievance been Resolved?	☐Yes ☐No; ***If not provide a justification below***
Fill Out Either Section 1 OR Section 2 below	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	

Social Manager:

Signature:

Date:

11.4 Annex 4 – Project Stakeholder Register Form

Stakeholder Engagement Register

Stakeholder			Details of Engagement	Communication Methods and Tools	Date of Engagement Activity	Responsibility
#	Name, position, group, etc.	Role				